IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF TENNESSEE AT NASHVILLE

TENNESSEE WALKING HORSE)	
BREEDERS' AND EXHIBITORS')	
ASSOCIATION,)	
)	
Plaintiff,)	
)	
v.)	No. 1:05-0088
)	JUDGE CAMPBELL
NATIONAL WALKING HORSE)	MAGISTRATE KNOWLES
ASSOCIATION,)	
)	
Defendant.)	

STIPULATED PROTECTIVE ORDER

By stipulation and agreement of the parties pursuant to the provisions of Rule 26(c) of the Federal Rules of Civil Procedure, as evidenced by the signatures below, IT IS HEREBY ORDERED that:

- 1. Defendant and its attorneys shall not, in any manner, directly or indirectly, disclose or transfer any of the documents or information provided by Plaintiff, pursuant to discovery requests made by Defendant, either orally or in writing, to any person except for the preparation for, and conduct of, this litigation.
- 2. Any documents or written information that Plaintiff provides Defendant, pursuant to discovery requests, or copies or extracts thereof, (hereinafter "Documents") shall be retained in the custody of Defendant or its attorneys (or its attorneys' agents) during this litigation.
- 3. Defendant shall promptly, at such time as it and its attorneys have no further use for the Documents, but no later than the completion of this litigation, return to Plaintiff all Documents.

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- 4. Plaintiff and its attorneys shall not, in any manner, directly or indirectly, disclose or transfer any of the documents or information provided by Defendant, pursuant to discovery requests made by Plaintiff, either orally or in writing, to any person except for the preparation for, and conduct of, this litigation.
- 5. Any documents or written information that Defendant provides Plaintiff, pursuant to discovery requests, or copies or extracts thereof, (hereinafter "Documents") shall be retained in the custody of Plaintiff or its attorneys (or its attorneys' agents) during this litigation.
- 6. Plaintiff shall promptly, at such time as it and its attorneys have no further use for the Documents, but no later than the completion of this litigation, return to Defendant all Documents.

It is so ORDERED.

Entered this the day of , 2006.

APPROVED FOR ENTRY:

MAGISTRATE JUDGE KNOWLES

/s/ Stephen J. Zralek

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and

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/s/ Thomas C. Corts (by Stephen J. Zralek, w/ express permission)

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Counsel for National Walking Horse Association

CERTIFICATE OF SERVICE

I certify that a true and exact copy of the foregoing has been served via ECF, on this 27th day of April, 2006, on the following:

Bruce H. Phillips, Esq. 11 Music Circle South, Suite 202 Nashville, TN 37203

and

Thomas C. Corts, Esq.
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Counsel for Defendant

/s/ Stephen J. Zralek

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